



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WMP/JK/AES
F. #2014R00501

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 28, 2016

By ECF and FedEx

Benjamin Brafman, Esq.
Marc Agnifilo, Esq.
Andrea Zellan, Esq.
Brafman & Associates, P.C.
767 Third Avenue, 26th Floor
New York, New York 10017

Joel Cohen, Esq.
Reed Brodsky, Esq.
Lisa Rubin, Esq.
Gibson Dunn
200 Park Avenue
New York, NY 10166-0193

Re: United States v. Martin Shkreli, et al.
Criminal Docket No. 15-637 (KAM)

Dear Counsel:

In accordance with Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter.¹ This disclosure supplements the government's earlier disclosure under cover of letters dated December 22, 2015, January 15, 2016, March 16, 2016 (Greebel) and March 25, 2016 (Shkreli). In addition, this disclosure is governed by the stipulations so ordered by the Court between the government and defendants (filed as Dkt. Nos. 44 and 47). The government again requests reciprocal discovery from the defendants.

Enclosed please find a thumb drive² that contains copies of the following materials:

¹ The government is providing the discovery described herein to defendant Greebel on April 28, 2016. The government is waiting to receive a thumb drive from defendant Shkreli; once that thumb drive is received, the government will provide the identical discovery to defendant Shkreli.

² Once you have downloaded the discovery from the thumb drive, please return the drive to our office so that we can re-use it for the next production; we can only provide one thumb drive per defendant. Alternatively, you may provide us with a thumb drive or external hard drive that we can use for future productions.

Description	Bates Range
Records received from Retrophin, Inc.	R024568 to R048350
Records received from Ladenburg Thalman regarding account related to Retrophin Inc.	Ladenburg-000001 to Ladenburg-001688
Records received from Bank of America regarding account related to MSMB Healthcare LP	BOA-000001 to BOA-000186
Records received from JP Morgan Chase regarding accounts related to Desert Gateway Inc.; Retrophin Inc.; Isotope Research LLC; Surepoint Capital Management LLC; Surepoint Management LLC; MKM Incubator LLC; MSMB Healthcare Management LLC; MSMB Endocytosis Management LLC; Simpleapp, LLC; MSMB Isotope Management LLC; MSMB Isotope GP LLC; MSMB Isotope Fund LP; MSMB Consumer LP; MSMB Consumer Management LLC; MSMB Consumer GP LLC; MSMB Healthcare Investors LLC; Martin Shkreli; Ironman Acquisition Management LLC; Surepoint Investment Fund LLC; Turing Pharmaceuticals LLC; Raptr Technologies LLC; and MSMB Capital Management LP	JPMC-001042 to JPMC-004601
Records received from individual DD ³	DD-000001 to DD-000132
Records received from individual AG	AG 001109 to AG 001117
Records received from individual JN	JN0621 to JN0628
Records received from AT&T	AT&T-000001 to AT&T-000792
Records received from the Federal Reserve	FEDWIRE-000001
Records received from XO Comm	XOCOMM-000001

³ To protect the privacy of individuals who have produced records, the government references these individuals by their initials only; in addition, to the extent that the Bates prefix reveals the identity of an individual, portions of the prefix have been replaced here with asterisks (**). The identity of these individuals is readily apparent from the records enclosed herein; however, should the defendants have any questions about the identity of these individuals, the government will provide that information under separate cover.

In addition, enclosed please copies of the following materials received by the United States Attorney's Office from the United States Securities and Exchange Commission ("SEC"):

Description	Bates Range
Records received by the SEC from individual GB	SEC-B*****G-E-0000001 to SEC- B*****G-E-0000056
Records received by the SEC from individual DG	SEC-G*****D-P-0000001 to SEC-G*****D-P-0000081
Records received by the SEC from individual RJ	SEC-J*****R-E-0000001 to SEC-J*****R-E-0000227
Records received by the SEC from individual SM	SM-0000001 to SM-0000178A
Records received by the SEC from individual SS	SEC-S*****S-E-0000001 to SEC-S*****S-E-0000209
Records received by the SEC from individual MT	SEC-T*****M-P-0000001 to SEC-T*****M-P-0000206
Records received by the SEC from Retrophin	RTRX000000001 to RTRX000027954

Please also note that the thumb drive is encrypted, and that the password for the drive will be provided via email. If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

ROBERT L. CAPERS
United States Attorney

By: /s/ Alixandra Smith
Winston Paes
Jacquelyn Kasulis
Alixandra Smith
Assistant U.S. Attorneys
(718) 254-7000

Enclosure

cc: Clerk of the Court (KAM) (by ECF) (w/o enclosures)